

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

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In re:

CLERK'S OFFICE  
DISTRICT COURT  
SAN JUAN, PR  
Title III

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD OF PUERTO RICO,

As representative of

No. 17 BK 3283-LTS  
(Jointly Administered)

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.  
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**RESPONSE AND JOINDER OF  
KENNETH KIRSCHENBAUM AND KENNETH KIRSCHENBAUM FAMILY TRUST  
TO MOTIONS TO DISMISS OMNIBUS CLAIM OBJECTIONS TO  
CLAIMS FILED OR ASSERTED BY HOLDERS OF CERTAIN COMMONWEALTH  
GENERAL OBLIGATION BONDS AND PUBLIC BUILDINGS AUTHORITY BONDS**

TO: HONORABLE LAURA TAYLOR SWAIN  
UNITED STATES DISTRICT JUDGE

Kenneth Kirschenbaum ("Mr. Kirschenbaum"), *pro se* individual holder of Commonwealth General Obligation Bonds issued in 2014, identified under CUSIP 74514LE86 [Claim No. 10949], and Kenneth Kirschenbaum Family Trust ("Family Trust"), *pro se* holder of Commonwealth General Obligation Bonds issued in 2014, identified under CUSIP 745220FK9 [Claim No. 10735], hereby responds to the: (i) Omnibus Objection of (I) Financial Oversight and Management Board, Acting Through its Special Claims Committee, and (II) Official Committee of Unsecured Creditors Pursuant to Bankruptcy Code Section 502 and Bankruptcy Rule 3007, to Claims Filed or Asserted by Holders of Certain Commonwealth General Obligations Bonds [Dkt. No. 4784]; and (ii) Omnibus Objection of (I) Financial Oversight and Management Board, Acting Through its Special Claims Committee, and (II) Official Committee of Unsecured Creditors Pursuant to Bankruptcy Code Section 502 and Bankruptcy Rule 3007, to Claims Filed

or Asserted by Holders of Certain Puerto Rico Buildings Authority Bonds [Dkt. No. 8141] (collectively, "Claim Objections").

1. Mr. Kirschenbaum and the Family Trust hereby join and seek the same relief (to wit, dismissal of the Claim Objections) as sought in the:

(i) Omnibus Motion to Dismiss of the Lawful Constitutional Debt Coalition, Pursuant to Bankruptcy Rule 7012, Of Claim Objections Filed or Asserted by the Financial Management Oversight Board for Puerto Rico and the Official Committee of Unsecured Creditors [Dkt. No. 10697];

(ii) Motion of the *Ad Hoc* Group of General Obligation Bondholders, *Ad Hoc* Group of Constitutional Debtholders, Assured Guaranty Corp. and Assured Guaranty Municipal Corp., and the Invesco Funds to Dismiss Omnibus Claim Objections to Claims Filed or Asserted by Holders of Certain Commonwealth General Obligation Bonds and Public Building Authority Bonds [Dkt. No. 10702]; and

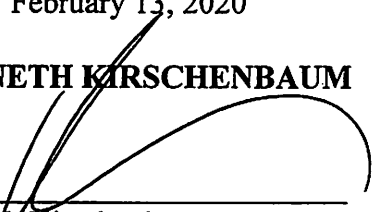
(ii) The QTCB Noteholder Group's Response to Certain Omnibus Objections and Limited Joinder to the Motion of the *Ad Hoc* Group of General Obligation Bondholders, *Ad Hoc* Group of Constitutional Debtholders, Assured Guaranty Corp. and Assured Guaranty Municipal Corp., and the Invesco Funds to Dismiss Omnibus Claim Objections to Claims Filed or Asserted by Holders of Certain Commonwealth General Obligation Bonds and Public Building Authority Bonds [Dkt. No. 10705].

2. Mr. Kirschenbaum and the Family Trust incorporate by reference herein the legal arguments made in the above referenced Motions and Response to the Claim Objections.

3. Mr. Kirschenbaum and the Family Trust do not waive, and expressly preserve all other factual and legal arguments to the Claim Objections that support allowance of their claims in these Title III Cases.

Dated: Garden City, New York  
February 13, 2020

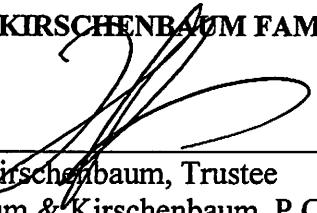
**KENNETH KIRSCHENBAUM**



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Kenneth Kirschenbaum  
Kirschenbaum & Kirschenbaum, P.C.  
200 Garden City Plaza, Suite 315  
Garden City, New York 11530  
(516) 747-9700

Dated: Garden City, New York  
February 13, 2020

**KENNETH KIRSCHENBAUM FAMILY TRUST**



By: \_\_\_\_\_  
Lawrence Kirschenbaum, Trustee  
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